



WESTON SOLUTIONS, INC.
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September 25, 2020

Mr. Andy Park, Acting Chief
Corrective Action Section
Hazardous Waste Programs Branch
U.S. EPA Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Mr. Conetta and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 60, which covers the activities associated with the Hatco Site from June 1 through August 31, 2020. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in blue ink, appearing to read "Jason Schindler", is written over a large, stylized blue checkmark or "V" shape.

Jason Schindler
Principal Project Manager

cc: S. Ferreira, (USEPA)
A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, L. Kirby, E. Ostapczuk (Hatco/LANXESS)
M. DiNinno (MCUA)
V. Puranapanda (CHUBB)



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 60
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: June 1 through August 31, 2020
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report Number 59 on June 30, 2020.
 - 5.2 Weston provided monthly progress updates by email to the United States Environmental Protection Agency (USEPA) on June 8, July 6, and August 3, 2020.
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Weston continued light non-aqueous phase liquid (LNAPL) recovery operations. Weston conducted recovery operations at the site using automated skimmer pumps and manual bailers. Total recovery through the end of this reporting period:
 - 10,425 gallons of LNAPL recovered using skimmer pumps and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation.
 - 6.2 Monthly progress meetings with the Licensed Site Remediation Professional (LSRP).
 - 6.3 Evaluation of properties adjacent to the Channel D/AOC 25 area, south of Riverside Drive, has identified several other likely sources of contamination to AOC 25. Weston is working with the property owners to evaluate these conditions. Weston prepared the Supplemental Sampling Plan for AOC 25 to address data gaps identified in the northern portion of Channel D/AOC 25. A copy was provided to EPA and DEP on March 18. Weston finalized the access agreement with the property owner and sampling was conducted from August 3 through August 26, 2020. Weston is preparing a GP12 application for the next phase of delineation sampling which will target depths greater than 3 feet at selected locations as determined by the results of the initial sampling. Weston prepared an ecological risk assessment work plan for BEHP in AOC 25. Copies of the work plan were provided to NJDEP and USEPA on July 7, 2020.
 - 6.4 Weston is working to complete the site-wide cap design and to finalize plans for the field sampling program that is needed to determine the final cap extent. USEPA,

Weston and LANXESS participated in a conference on July 16, 2020 to review aspects of the preliminary design of the site wide cap. Questions were reviewed with USEPA during a telephone call on August 18, 2020 and Weston is currently preparing a preliminary work plan to clarify the capping approach. By email dated May 11, EPA accepted the field sampling plan with one clarification. On June 1, 2020, Weston distributed the final field sampling plan to the parties involved. The sampling program began on Wednesday, June 10, and was completed on July 16, 2020. Laboratory results and data evaluation will be completed over the next few months to support the final site-wide cap design.

- 6.5 An emergency permit modification to address additional streambank erosion in Slingtail Creek was granted by NJDEP on October 23, 2019. The Soil Erosion and Sediment Control Plan (SESCP) application was submitted to Freehold Soil Conservation District (FSCD) on January 31, 2020 and approved on March 10, 2020. FSCD did not require permit approval in advance of the emergency repair. Work began on February 24, 2020 and construction was completed on March 5, 2020. The permit modification was submitted to NJDEP on June 9, 2020. By letter dated July 8, 2020, NJDEP requested clarifications of certain information provided with the permit submittal; Weston discussed the clarifications with NJDEP on August 17, 2020 and is currently updating the plans for NJDEP review. Weston is evaluating potential additional areas of streambank erosion this fall and re-evaluating the Riparian Zone Mitigation Plan previously submitted to NJDEP. Weston will revise the Riparian Zone Mitigation Plan to NJDEP for approval following the evaluation of potential additional areas of erosion.
- 6.6 Weston has completed the remediation of Hatco-related contaminants identified in Woodbridge Pond sediments (Hatco AOC 24). The final walk through with Woodbridge Township, the property, owner was completed on September 27, 2019. The draft Remedial Action Report for AOC 24 is currently under review. Weston conducted monthly soil erosion and sediment control inspections, as per the approved SESCO. A Final Report of Compliance was issued by Freehold Soil Conservation District (FSCD) on July 24, 2020. Annual wetland monitoring was performed on August 20, 2020. A wetland monitoring report will be prepared. The NJ Division of Fish and Wildlife restocked the pond with fish on August 28, 2020.
- 6.7 During the Woodbridge Pond remediation project an isolated area of PCB-contaminated sediment was identified in the wetland portion of the adjacent Crown Relocators property (part of Hatco AOC 23). Weston has prepared a work plan and permit modification application necessary to remove an isolated area of PCB-contamination identified. The permit application was submitted to NJDEP on August 20, 2020.
- 6.8 Water was observed seeping out of the ground at the decommissioned seep interceptor vault system in early 2019. Iron staining was noted on the surface of the surrounding pavement. No evidence of LNAPL or PCB exceedances were detected in the samples of water from the vault in June 2019 and February 2020. Weston pumped out the vault on June 5 and 26, 2020 to prevent further seepage and is working to develop a permanent solution for the situation. Weston is working on plans to remove the structures associated with the vault.
- 6.9 Weston is continuing preparation of the remedial action progress reports for the completed Southeast Leg, Northeast Impoundment and Former Lagoon Cap remediation projects.



- 6.10 On September 19, 2019, Weston and the LSRP worked with NJDEP to combine the regulatory case involving the discharge to the reconstructed onsite wetlands (reported on June 19, 2018; Case No. 18-06-22-1109-21) with the Hatco remediation project. Weston has prepared the sampling plan to assess the onsite wetland; the plan was submitted to USEPA for review on January 30, 2020. USEPA and NJDEP provided comments on February 11, 2020. Weston provided a response to the comments on March 13, 2020. Phase 1 sampling was completed on April 23, 2020. Results of the Phase 1 sampling and recommendations for the Phase 2 Sampling program were provided to USEPA and NJDEP on July 31, 2020. Weston received comments from EPA and NJDEP on August 20, 2020 and is currently preparing a response with clarifications.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 Update scope and schedule for Channel D remediation.
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 Weston is currently in discussions with the property owners for Channel D and will update the scope and schedule based on those discussions.
9. Specific Requirements to be Initiated in Next Reporting Period (September - November 2020):
 - 9.1 Continue preparation of Southeast Leg, Northeast Impoundment, and Former Lagoon Cap Remedial Action Progress Reports, and Woodbridge Pond Remedial Action Report.
 - 9.2 Confer with USEPA to review preliminary engineering plans for site-wide capping of remaining contaminated soil.
 - 9.3 Implement Phase 2 sampling of the Southeast Leg Pond Area.
 - 9.4 Preparations for remediation of contamination on Crown Relocations Property (AOC 23), pending permit approval.